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January 17, 2007

Prem K. Bahl
Electric Utilities Engineer
Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007

Dear Mr. Bahl:

The purpose of this letter is to provide you with comments regarding the Arizona Corporation Commission's Draft Fourth Biennial Transmission Assessment 2006 - 2015 Report, Docket No. E-00000D-05-0040.

Section 5.3, Figure 12 "Tucson area HV transmission system" shows three tie lines between Saguaro and Tortolita. The Figure should be corrected to show only two 138kV lines with a notation that these lines are normally open.

In section 6.2.3, TEP suggests that the third paragraph be rewritten to read:

"TEP plans and operates its system to meet the WECC/NERC Reliability Criteria for both level B (n-1) and Level C (n-2; n-1-1) contingencies above the WECC/NERC Reliability Criteria. TEP also plans and operates its system to meet level D criteria (n-2) as well as the WECC Voltage Stability Criteria."

In section 6.2.3.1 paragraph two, the last sentence, the word Vale is spelled incorrectly. It should be spelled "Vail".

There were two items that TEP was asked to comment on that were identified as "under review". These items were located in Table 15 "Overlapping contingency results" and Table 16 "Extreme contingency results". The two issues referenced overloads that took place outside of TEP's system due to overlapping or extreme contingencies. The overloads occurred on the systems outside of the control of TEP. Regarding the last item in Table 15, TEP observed overloads in New Mexico due to a simultaneous contingency of TEP's Springerville to Pyoung 345kV line and El Paso's Springerville to Luna 345kV line. The second contingency occurred on El Paso's system in New Mexico and is an issue for the New Mexico utilities to address.

Regarding the next to the last item in Table 16, TEP observed an overload of the Shiprock transformer due to the loss of all TEP 345kV / 138kV transformers at Vail. This is an issue that should be addressed by Western.

We are pleased with the work that was put into the report and appreciate the opportunity to comment. If you have any questions regarding these comments please let me know.

David Couture


Director, Regulatory Services
Tucson Electric Power Company
(520) 884-3752

Cc: ACC Docket Control (one original and 13 copies)